

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

Roger Jason Stone, Jr.

Defendant.

Crim. No.

CHARGES:

Grand Jury Original

18 U.S.C. § 1505 (Obstruction of Official Proceeding)

18 U.S.C. § 1001 (False Statements)

18 U.S.C. § 1512(b)(1) (Witness Tampering)

18 U.S.C. § 2 (Causing an Act to be Done)

UNDER SEAL

**MOTION FOR SEALING OF THE INDICTMENT, WARRANTS, THE INSTANT
MOTION AND TO DELAY ENTRY ON THE PUBLIC DOCKET OF
THE FILING OF THIS MOTION TO SEAL AND ALL RELATED MATTERS**

The United States of America, by and through Special Counsel Robert S. Mueller III, respectfully moves this Court to seal the accompanying Indictment, arrest warrant, and the instant motion to seal, and to delay entry on the public docket of this motion to seal and all related matters until the defendant named in the indictment is in custody. In the support of this motion, the government states as follows:

The defendant in this case has been indicted for obstruction, in violation of 18 U.S.C. § 1505; false statements, in violation of 18 U.S.C. § 1001; witness tampering, in violation of 18 U.S.C. § 1512(b)(1); as well as aiding and abetting, in violation of 18 U.S.C. § 2.

Law enforcement believes that publicity resulting from disclosure of the Indictment and related materials on the public record prior to arrest will increase the risk of the defendant fleeing and destroying (or tampering with) evidence. It is therefore essential that any information concerning the pending indictment in this district be kept sealed prior to the defendant's arrest.

Accordingly, the government submits that under *Washington Post v. Robinson*, 935 F.2d 282, 289 n.10 (D.C. Cir. 1991), these facts present an extraordinary situation and a compelling governmental interest that justifies not only the sealing of the Indictment and all other pleadings, warrants, records, and files in this case, but also a short delay in the public docketing of these sealed pleadings and the accompanying order until the defendant's arrest.

A proposed order accompanies this motion.

Respectfully submitted,

ROBERT S. MUELLER III
Special Counsel

Dated: January 24, 2019

By: /s/
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UNDER SEAL

ORDER

Upon consideration of the government's Motion for Sealing of the Indictment, Warrant, the Instant Motion, and to Delay Entry on the Public Docket of the Filings of the Motion to Seal and all Related Matters; for the reasons set out therein; and in consideration of *Washington Post v. Robinson*, 935 F.2d 282, 289 n.10 (D.C. Cir. 1991), it is hereby

ORDERED that the Indictment, Warrant, the Instant Motion and that entry on the public docket of the filings of the motion to seal and all related matters be delayed until the defendant named in the Indictment is in custody, at which time the foregoing materials shall be unsealed; and

IT IS FURTHER ORDERED that the government shall inform the Court as soon as the defendant named in the Indictment is in custody so that the foregoing materials can be unsealed and entered on the public docket.

Date

HON. DEBORAH A. ROBINSON
UNITED STATES MAGISTRATE JUDGE